

UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

Pittsburgh Division

SHANNI SNYDER

Case No. 2:21-cv-904

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

U LOCK INC. a/k/a U-LOCK INC.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF FAIR LABOR STANDARDS

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Shanni Snyder
Street Address	14390 Route 30
City and County	North Huntingdon, Westmoreland County
State and Zip Code	PA 15642
Telephone Number	
E-mail Address	shannis@pm.me

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name U LOCK INC. a/k/a U-LOCK INC.

Job or Title *(if known)*

Street Address 14140 ROUTE 30

City and County NORTH HUNTINGDON, WESTMORELAND COUNTY

State and Zip Code PA 15642

Telephone Number

E-mail Address *(if known)*

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

C. Place of Employment

The address at which I am employed or was employed by the defendant(s) is

Name	U LOCK INC a/k/a U-LOCK INC.
Street Address	14140 ROUTE 30
City and County	NORTH HUNTINGDON, WESTMORELAND COUNTY
State and Zip Code	PA 15642
Telephone Number	

II. Basis for Jurisdiction

This action is brought pursuant to *(check all that apply)*:

- ☒ Fair Labor Standards Act, as codified, 29 U.S.C. §§ 201 to 209.
- ☐ Relevant state law
- ☐ Relevant city or county law

III. Statement of Claim

State as briefly as possible the facts of your case. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Nature of employer's business:

Storage facility

B. Dates of employment:

Monitor video surveillance remotely.

C. Employee's job title and a description of the kind of work done:

Monitor of video

D. Rate, method, and frequency of wage payment:

\$7.25/hour to be paid monthly. However, employer asked that it be deferred until a mortgage could be obtained on their property.

- E. Number of hours actually worked each week in which a violation is claimed:
70 hours per week from January 1, 2016, through February 15, 2020. Specifically, Plaintiff monitored video surveillance and cameras from 5 p.m. until 3 a.m. each day.
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- F. Description of the alleged violation(s) (*check all that apply*):



Failure to pay the minimum wage (*explain*)

Defendant promised to pay minimum wage, but did not pay. Instead it continually asked that it be deferred until it could receive a mortgage on its property.



Failure to pay required overtime (*explain*)

Defendant did not pay overtime wages



Other violation(s) (*explain*)

- G. Date(s) of the alleged violation(s):
From January 1, 2016, through February 15, 2020.
-

- H. Additional facts:
1. Defendant acted willfully in that it knew it did not pay the wage, but made representations to expand the time upon which Plaintiff would expect to be paid.
 2. Defendant tolled any statute of limitations by continually promising that payment would be forthcoming after it was able to obtain a mortgage on its property. The representations were made continually up to and through May 2021.
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IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff demands judgment in the amount of \$131,351 (\$108,079 in hourly wage and \$23,272 overtime), prejudgment interest, post-judgment interest, costs, fees, and attorney fees if Plaintiff retains legal counsel.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/14/2021

Signature of Plaintiff /s/ Shanni Snyder

Printed Name of Plaintiff /s/ Shanni Snyder

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Pro Se 8 (Rev. 12/16) Complaint for Violation of Fair Labor Standards

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address